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Carrier

A United Technologies Company

John M. Mandyck
Vice President
Government and International Relations

June 23, 2005

Ms. Rachel Schmeltz
U.S. Environmental Protection Agency
Energy Star Program
Washington, D.C.

Dear Rachel:

Carrier Corporation is pleased to submit these comments on the proposed changes to Energy Star specifications for residential central air conditioners and heat pumps.

Let me start by thanking EPA for the meaningful changes proposed in the latest draft specifications. Specifically, the standard level adjustments for split systems will provide greater consumer choice and enhance Energy Star penetration in the marketplace. We also commend the decision to maintain manufacturers as full program partners. These changes will continue the long tradition of success for the Energy Star Program.

We offer two specific comments for this final round of consideration.

I. Gas/Electric Packaged Units

We urge EPA to maintain gas/electric packaged units in the Energy Star program. These units comprise more than half of the total market volume for packaged HVAC systems. Eliminating these systems would substantially reduce the effectiveness of the Energy Star program, particularly in key western and southeastern markets.

The efficiency requirement for cooling performance of gas/electric packaged units achieves a significant portion of Energy Star's objectives for energy conservation. For heating requirements, established levels should not exceed 80% AFUE to avoid corrosion and reliability issues.

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II. Single and 3-Phase Harmonization

We recommend harmonization of single and 3-phase packaged products at 14.0 SEER, 11.0 EER, 8.0 HSPF, and also harmonization of single and 3-phase split systems at 14 SEER, 11.5 EER, 8.2 HSPF. We only support harmonization if the specifications are at these levels.

The basis for our recommendation is to avoid marketplace confusion with this product class, especially given the shared capacity ranges with single phase equipment less than 65K Btuh. Harmonized Energy Star values for both single and 3-phase equipment would greatly simplify rebate and incentive programs that are tied to Energy Star. This designation will also be more consistent than dividing equal capacity products between "residential" and "light commercial" categories.

Thank you for considering our views and for the improvement in the draft specifications to date.

Sincerely,

A handwritten signature in dark ink, appearing to read "John M. Mandyck". The signature is fluid and cursive, with the first name "John" and last name "Mandyck" clearly distinguishable.

John M. Mandyck
Vice President
Government & International Relations